

EXHIBIT A



NachaTM

Nacha / 2019 Nacha Operating Rules / Article Two Rights and Responsibilities of ODFIs, Their Originators, and Third-Party Senders

Subsection 2.12.4 Reinitiation of Returned Entries

Subsection 2.12.4.1 General Rule for Reinitiated Entries

An Originator or ODFI may Reinitiate an Entry, other than an RCK Entry, that was previously returned, only if:

- (a) the Entry was returned for insufficient or uncollected funds;
- (b) the Entry was Returned for stopped payment and Reinitiation has been separately authorized by the Receiver after the Originator or ODFI receives the Return Entry; or
- (c) the Originator or ODFI has taken corrective action to remedy the reason for the return.

The Originator or ODFI must Reinitiate the Entry within 180 days after the Settlement Date of the original Entry. An Originator or ODFI must not Reinitiate an Entry that has been returned for insufficient or uncollected funds more than two times following the Return of the original Entry.

An Originator or ODFI may Reinitiate an RCK Entry that was previously returned if:

- (d) the RCK Entry has been returned for insufficient or uncollected funds; and
- (e) the item to which the RCK Entry relates has been presented no more than one time through the check collection system (as a Check, substitute check, or image) and no more than one time as an RCK Entry.

A debit Entry will not be treated as a Reinitiated Entry if:

- (f) the debit Entry is one in a series of preauthorized, recurring debit Entries and is not contingent upon whether an earlier debit Entry in the recurring series has been Returned; or,
- (g) the Originator obtains a new authorization for the debit Entry after it receives the original Return Entry; or,
- (h) the debit Entry is initiated to the Receiver's correct account following the return of a previous Entry using Return Reason Code R03 (No Account/Unable to Locate Account) or R04 (Invalid Account Number Structure).

Subsection 2.12.4.2 Formatting Requirements for Reinitiated Entries

An Originator or ODFI must submit Reinitiated Entries as a separate batch that contains the word "RETRY PYMT" in the Company Entry Description field of the Company/Batch Header Record. For any Reinitiated Entry, the description "RETRY PYMT" must replace the original content of the Company Entry Description field transmitted in the original Entry, including content otherwise required by these Rules.

The contents of the Company Name, Company Identification, and Amount fields of the Reinitiated Entry must be identical to the contents of the original Entry. The contents of other fields should be modified only as necessary to correct an error or facilitate proper processing of the Reinitiated Entry.

Subsection 2.12.4.3 Improper Reinitiation Practices

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All of the following will be treated as improper Reinitiation practices that do not meet the requirements of Subsection 2.12.4.1 (General Rule for Reinitiated Entries):

- (a) Following the Return of an Entry, initiating an Entry to the same Receiver in an amount greater than the amount of the previously Returned Entry in payment or fulfillment of the same underlying obligation plus an additional fee or charge.
- (b) Following the Return of an Entry, initiating one or more Entries to the same Receiver in an amount(s) less than the original Entry in payment or fulfillment of a portion of the same underlying obligation.
- (c) Reinitiating any Entry that was Returned as unauthorized.
- (d) Initiating any other Entry that the National Association reasonably believes represents an attempted evasion of the limitations on Reinitiation.

